

**Mississippi Electronic Courts
Seventh Circuit Court District (Hinds Circuit Court - Jackson)
CIVIL DOCKET FOR CASE #: 25CI1:18-cv-00697-AHW**

CREAMER v. EDGEWOOD TERRACE, LLC et al
Assigned to: Adrienne Wooten

Date Filed: 12/10/2018
Current Days Pending: 44
Total Case Age: 44
Jury Demand: None
Nature of Suit: 181 Negligence -
General

Plaintiff

ANGELA CREAMER
*AS NEXT FRIEND AND NATURAL
MOTHER OF HER MINOR CHILD,
C.C., IN HIS INDIVIDUAL
CAPACITY*

represented by **Katrina S. Brown, Esq.**
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ATTORNEY TO BE NOTICED

V.

Defendant

EDGEWOOD TERRACE, LLC
doing business as
EDGEWOOD TERRACE
APARTMENTS

Defendant

REBA ALFORD
INDIVIDUALLY

Defendant

JOHN DOES 1-9

Defendant

**MULTIFAMILY
MANAGEMENT, INC.**

Date Filed	#	Docket Text
12/10/2018	<u>2</u>	COMPLAINT against REBA ALFORD, EDGEWOOD TERRACE, LLC, JOHN DOES 1-9, filed by ANGELA CREAMER. (Attachments: # <u>1</u> Civil Cover Sheet,) (DKW) (Entered: 12/10/2018)

12/10/2018	<u>3</u>	SUMMONS Issued to EDGEWOOD TERRACE, LLC. (DKW) (Entered: 12/10/2018)
12/10/2018	<u>4</u>	SUMMONS Issued to REBA ALFORD. (DKW) (Entered: 12/10/2018)
12/10/2018	<u>5</u>	SUMMONS Issued to MULTIFAMILY MANAGEMENT, INC.. (DKW) (Entered: 12/10/2018)
01/07/2019	<u>6</u>	SUMMONS Returned Executed by ANGELA CREAMER. Re: ** <u>5</u> SUMMONS Issued to MULTIFAMILY MANAGEMENT, INC.. (DKW)** MULTIFAMILY MANAGEMENT, INC. served on 1/2/2019, answer due 2/1/2019. Service type: Personal (Brown, Katrina) (Entered: 01/07/2019)

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Billable Pages:	2	Cost:	0.40

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

**ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY**

PLAINTIFF

v.

CAUSE NO.: 18-697

**EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9**

DEFENDANTS

**COMPLAINT
w/ discovery attached
(JURY TRIAL DEMANDED)**

Plaintiff Angela Creamer, as next friend and natural mother of her minor child, C.C., in his individual capacity, by and through her attorneys of record, files this her Complaint against Defendants Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments, Multifamily Management, Inc., Reba Alford, Individually, and John Doe Defendants Nos. 1-9 (referred to collectively sometimes as "Defendants"). In support thereof, Plaintiff states as follows:

PARTIES

1. Plaintiff Angela Creamer is the natural mother of C.C., a minor, and is an adult resident of Jackson, Hinds County, Mississippi.
2. Defendant Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments (hereinafter "Edgewood Terrace") is a domestic company doing business in the State of Mississippi and may be served with process through its registered agent for service, Nancy Joseph located at 220 Edgewood Terrace Drive, Suite F-11, Jackson, Mississippi 39236.
3. Defendant Multifamily Management, Inc., is a foreign business doing business in

the State of Mississippi, with its principal office at 2866 Dauphin Street, Suite N, Mobile, Alabama 36606, and may be served with process through its registered agent for service, Tere Richardson Steel, located at 759 Vieux Marche Mall, Biloxi, Mississippi 39530.

4. Defendant Reba Alford (hereinafter "Alford") is an adult resident citizen of Hinds County, Mississippi and may be served with process at her place of employment, 330 Four Seasons Drive, Apartment C-13, 220, Jackson, Mississippi 39206, or wherever she may be found.

5. Defendants John Does #1-9 are unknown individuals and/or entities liable to Plaintiff for the acts and omissions as alleged herein. The names and capacities of Defendants John Does #1-9 inclusive, whether individual, corporate, management company or otherwise, are presently unknown to Plaintiff, who therefore sues said Defendants by fictitious names and will further seek leave of this Honorable Court to amend this Complaint to show their true names and capacities when the same are ascertained.

6. Plaintiff alleges upon information and belief each of the Defendants designated herein responsible in some manner and liable herein to Plaintiff by reason of negligence, gross negligence, wanton and reckless misconduct, and/or in some other manner whether alleged herein in this Complaint or not, and by such wrongful conduct, said Defendants, each them, proximately caused the injury and damages occasioned to Plaintiff herein.

JURISDICTION AND VENUE

7. Jurisdiction and venue are proper in Hinds County as a substantial part of the events or omissions giving rise to this claim occurred in Hinds County and because one or more of the Defendants reside in Hinds County. This Court has jurisdiction over both the parties and the subject matter of this suit.

FACTS

8. On or about June 18, 2018, Contarius Creamer was an invitee of the Edgewood Terrace Apartments. Mr. Creamer was visiting Edgewood Terrace Apartment complex to speak with a leasing agent in the Apartment Complex leasing office. Mr. Creamer was aware of other individuals that had leased an apartment at Edgewood Terrace that had not reached the age of 21, so he wanted to discuss his options to rent an apartment there as well. Upon arriving at the complex, Mr. Creamer began walking to the leasing office when he was accosted by an assailant that pulled out a gun on him and demanded money. Mr. Creamer immediately ran back towards the vehicle he came in but was caught by the assailant in the common area of an apartment building where he was shot in the head and robbed.

9. At all pertinent times Edgewood Terrace Apartments was owned, operated, and/or managed by Edgewood Terrace, Multifamily Management, LLC, and Reba Alford.

10. At all pertinent times, Defendants Edgewood Terrace, Multifamily Management, LLC, and Reba Alford had a duty to Mr. Creamer and other invitees to make sure that the property, including all common areas, was secure and safe, and that reasonable security measures were provided and maintained and that all guests and invitees would be safe to enter the premises.

11. Upon information and belief, at all pertinent times, Defendants Edgewood Terrace, Multifamily Management, LLC, and Reba Alford owned, operated and/or managed Edgewood Terrace Apartments and had the authority, control and/or decision-making power to hire trained security guards and/or a management company to provide security to Edgewood Terrace Apartments.

12. Prior to June 18, 2018, Defendants knew or should have known that Edgewood Terrace had inadequate security, lighting, and that strangers, trespassers and loiterers frequently

came onto the property.

13. At all pertinent times, Mr. Creamer was an invitee of Edgewood Terrace Apartments. He was visiting a leasing office of Edgewood Terrace Apartments to discuss renting an apartment. While in a common area of an apartment building, he was shot in the head and robbed. During the time of this incident, there was no security being provided by management to protect invitees such as Mr. Creamer.

14. Mr. Creamer suffered as a result of the injuries sustained from this incident.

**NEGLIGENCE AND GROSS NEGLIGENCE OF EDGEWOOD
TERRACE, LLC D/B/A EDGEWOOD TERRACE APARTMENTS & MULTIFAMILY
MANAGEMENT, INC.**

15. Plaintiff adopts by reference the foregoing paragraphs as fully set forth herein.

16. At the time of the incident involving the Plaintiff, Edgewood Terrace, LLC and Multifamily Management, Inc. owned and/or operated Edgewood Terrace Apartments.

17. At the time of the incident involving the Plaintiff, Defendant Multifamily Management, LLC, and Reba Alford managed and/or operated Edgewood Terrace Apartments.

18. At the time of the incident involving the Plaintiff, he was in the common area of Edgewood Terrace Apartments this common area was not supervised, monitored, secured or protected to prevent armed trespassers/ loiterers from entering the premises.

19. Defendants and their agents and/or employees warranted, expressed and implied that the Edgewood Terrace Apartments complex, including all the common areas and general vicinity were secure and safe and that reasonable security measures were provided and maintained, and that the Plaintiff and other guests would have a peaceful and safe environment.

20. Defendants owed to the Plaintiff a duty to exercise reasonable care to warn of all known dangers and to provide reasonable and adequate security measures.

21. Defendants knew or should have known that Edgewood Terrace Apartments had inadequate security, that strangers, trespassers and loiters frequently came onto the Edgewood Terrace Apartments property, that the lack of a perimeter fence around the property allowed trespassers and loiters to enter onto the property freely.

22. At all relevant times, Defendants failed to fulfill their duty to use reasonable care, and to take adequate and reasonable security precautions to protect invitees of Edgewood Terrace Apartments from foreseeable harm and danger, including the harm suffered by Plaintiff.

23. Before June 18, 2018, Defendants knew, or should have known that Edgewood Terrace Apartments had a problem with crime occurring on and around the property, inadequate security, and crimes against property and persons were frequently committed at and around Edgewood Terrace Apartments and that, as a result, the premises was unreasonably dangerous, especially to invitees such as the Plaintiff.

24. As a direct result of these trespassers not being stopped or removed by security, Mr. Creamer was shot by the assailant in the common area of the apartment complex

25. The vicious attack against Plaintiff occurred in the common area of Edgewood Terrace Apartments and this area was not properly supervised, monitored, secured or protected to prevent entry by trespassers, or to prevent crimes from occurring against its invitees.

26. At all pertinent times to matters alleged herein, Defendants owned, possessed, controlled, and/or managed Edgewood Terrace Apartments, including all common areas, located at Edgewood Terrace Apartments, and/or had the right(s) to control and/or manage the Apartment Complex, including all common areas.

27. The Defendants, individually, jointly and severally, owed to and/or assumed for the benefit of their tenants and guests, an ordinary duty of care, specifically, the duty of reasonable care to make Edgewood Terrace Apartments and its common areas reasonably safe and secure and to provide reasonable security measures for all invitees. Defendants also owed Plaintiff a duty to exercise reasonable care in property management and to warn all invitees of foreseeable harm.

28. At all material times, Defendants failed to fulfill their duty to use reasonable care and to take adequate and reasonable security precautions or measures to protect invitees of Edgewood Terrace Apartments from foreseeable harm and danger, including the harm, injuries and damages, suffered by Plaintiff.

29. Before June 18, 2018, Defendants knew or should have known that the apartment complex had inadequate security and was inadequately maintained such that trespassers, loiterers and vagrants frequently came onto Edgewood Terrace Apartments premises and that crimes were occurring against tenants/invitees in surrounding areas and on the property. Despite their knowledge of these unsafe and inadequate conditions, Defendants did nothing to remedy or repair these conditions which were the proximate cause and/or proximate contributing cause of the actions against Plaintiff and the resulting damages.

30. At all times pertinent, the Defendants had no measures in place to prevent the admission of unlawfully armed and/or dangerous persons onto the common areas of the apartment complex.

31. Additionally, there was no security guard stationed at the entrance of the apartment complex or patrolling the complex to deter and/or keep trespassers out of the premises.

32. The Plaintiff injuries are a direct result of the Defendants' inadequate security and maintenance of the property.

33. At the time of the incident, Defendants failed to fulfill their joint, several, and/or collective duties of ordinary reasonable care relative to keeping their premises safe, including the common areas, for all invitees. Defendants failed to take reasonable security precautions or measures for the apartment complex including the common areas and to take other such reasonable security precautions or measures to protect invitees from foreseeable harm and danger, including the harm suffered by Plaintiff and his family. There have been many violent crimes on the premises and the Defendants knew or should have known of these dangers.

34. At all times pertinent, the Defendants had actual and constructive knowledge that an atmosphere of violence existed on and about the subject premises as evidenced by the overall pattern of criminal activity prior to the event in question that occurred on and in the general vicinity of the premises.

35. The Defendants knew or should have known that reasonable security measures were needed for the premises and that the security measures provided were unreasonable and inadequate.

36. Despite knowledge of the conditions set out herein, specifically related to the lack of adequate security, Defendants did nothing to remedy or repair these unsafe conditions and inadequacies at Edgewood Terrace Apartments and failed to offer adequate security and protection to individuals such as Plaintiff.

37. Defendants failed to hire, supervise and maintain security on the property, failed to provide adequate instruction and supervision of the property's security service and of management, failure to adequately maintain and perform upkeep on the physical structures of the property,

security cameras, lights and other security devices and to not allow them to enter a state of disrepair or remain nonworking if they were broken.

NEGLIGENCE AND GROSS NEGLIGENCE OF DEFENDANT, REBA ALFORD

38. Plaintiff adopts by reference the foregoing paragraphs as fully set forth herein.

39. At the time of the incident involving the Plaintiff, Defendant Reba Alford was the manager of Edgewood Terrace Apartments.

40. Defendant Reba Alford breached her duty owed to Plaintiff and was negligent and/or grossly negligent by failing to provide protection and adequate security, by failing to take or implement reasonable measures for the safety and security of the Plaintiff, by failing to warn the Plaintiff of the foreseeable harm suffered, failing to take any affirmative actions to protect the premises from the foreseeable harm suffered by the Plaintiff.

41. The acts and omissions of Defendant Alford proximately caused and/or contributed to the Plaintiff injuries.

42. The acts and omissions of Defendant Alford are particularly egregious because she had actual and /or constructive knowledge or prior dangerous criminal acts that had taken place on the premises was well as the frequency and overall pattern of criminal activity on the premises and the surrounding community prior to June 18, 2018.

43. Defendant Alford was aware from actual or constructive knowledge that trespassers had caused problems and committed crimes against tenants and guests on the property. She was aware through tenant complaints that the lack of security on the property was troubling and that strangers and loiterers hung out on the property and Defendant Alford failed to take any action.

44. The actions on the part of Defendant Alford rise to the level of gross negligence, malice and intentional conduct, thereby subjecting her to individual liability.

NEGLIGENCE OF JOHN DOES 1-9

45. Plaintiff adopts by reference the foregoing paragraphs as fully set forth herein.

46. John Does 1-9 are entities, employees, agents, owners, operators or persons whose names and identities are unknown at this time to the Plaintiff, but who may have been working in conjunction with or in a joint venture or as a partner with the Defendants and may be responsible for the Plaintiff injuries and resulting damages. Plaintiff will amend the Complaint to add the names of the parties herein referred to as John Does when that information becomes available through discovery.

DAMAGES

47. Plaintiff adopts by reference the foregoing paragraphs as fully set forth herein.

48. Plaintiff seeks damages for actual, compensatory, incidental, and consequential damages in an amount in excess of the jurisdictional minimum of this Court. In addition and without limitation, the Plaintiff claims all damages of every type and variety permitted by law including damages for, physical injuries, medical bills, past and present emotional distress, mental anguish, and the mental trauma and emotional injuries and past and present pain and suffering suffered by Plaintiff.

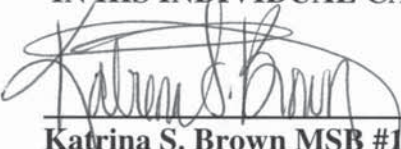
49. Defendants' actions, omissions, and conduct were done willfully and egregiously, without just cause, and in reckless, conscious and/or knowing disregard for Plaintiff rights and personal safety. Moreover, Defendants' actions, omissions, and conduct evidenced malice and a reckless disregard for the safety and wellbeing of other human beings. Plaintiff specifically request an award of punitive damages in an amount to deter the Defendants from similar or like willful, wanton, or egregious conduct.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests a trial by jury and demands from Defendants general, actual, compensatory, consequential, and incidental damages in an amount to be determined by the trier of fact, punitive damages in an amount to deter similar or like conduct by these Defendants, all expenses and costs of this civil action, and such other relief as the Court and the jury deem just.

Respectfully submitted, this the 10th day of December, 2018.

**ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY**

BY:



Katrina S. Brown MSB #102110
Attorney for Plaintiff

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IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: _____

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

PLAINTIFF'S REQUEST FOR ADMISSIONS TO
DEFENDANTS REBA ALFORD AND MULTIFAMILY MANAGEMENT, INC.

COME NOW the Plaintiff, by and through counsel of record, and propounds her First Set of Requests for Admissions to Defendants Reba Alford and Multifamily Management, Inc., to be answered separately by each Defendants within the requisite period of time pursuant to Mississippi Rules of Civil Procedure, propounding the same as follows:

REQUEST NO. 1: Please admit that at the time of the subject incident on June 18, 2018, Edgewood Terrace Apartments did not employ, hire or retain security guards/ officers to patrol the apartment complex premises.

REQUEST NO. 2: Please admit that Edgewood Terrace Apartments had an atmosphere of violence in the five years preceding the incident the subject of the Complaint.

REQUEST NO. 3: Please admit that there were no perimeter fences around Edgewood Terrace Apartments on June 18, 2018.

REQUEST NO. 4: Please admit that the Plaintiff was an invitee at Edgewood Terrace Apartments on June 18, 2018.

REQUEST NO. 5: Please admit that as the on-site property manager for Edgewood Terrace Apartments, Reba Alford, had the authority to retain security for Edgewood Terrace Apartments.

REQUEST NO. 6: Please admit that as the management company for Edgewood Terrace Apartments, Multifamily Management, Inc., had the authority to retain security for Edgewood Terrace Apartments.

REQUEST NO. 7: Please admit that there was no security surveillance cameras present at Edgewood Terrace Apartments common areas on June 18, 2018.

REQUEST NO. 8: Please admit that you had actual knowledge about incidents of violence on the premises of Edgewood Terrace Apartments prior to June 18, 2018.

REQUEST NO. 9: Please admit that you had constructive knowledge of the atmosphere of violence on the premises of Edgewood Terrace Apartments prior to June 18, 2018.

REQUEST NO. 10: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, Jackson, MS that is attached to these Request for Admissions reflect that on June 18, 2018, an aggravated assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 11: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on May 22, 2018, a robbery of an individual was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 12: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on March 28, 2018, a house burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 13: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on March 24, 2018, a house burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 14: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on February 22, 2018, a house burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 15: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on February 17, 2018, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 16: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on February 17, 2018, an auto burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 17: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on January 20, 2018, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 18: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on January 19, 2018, an auto burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 19: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on December 10, 2017, a house burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 20: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on December 9, 2017, an auto burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 21: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on November 24, 2017, a house burglary was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 22: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on November 9, 2017, an auto theft was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 23: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on November 9, 2017, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 24: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on July 16, 2017, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 25: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on July 15, 2017, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 26: Please admit that the Jackson Police Department offense listing for 220

Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on May 6, 2016, a robbery was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 27: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on March 9, 2016, a robbery was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 28: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on February 4, 2016, a robbery was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 29: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on January 22, 2016, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 30: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on December 16, 2015, a robbery and carjacking was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 31: Please admit that the Jackson Police Department offense listing for 220 Edgewood Terrace Drive, that is attached to these Request for Admissions reflect that on November 5, 2015, a simple assault was reported to have occurred on the grounds of Edgewood Terrace Apartments.

REQUEST NO. 32: Please admit that you allowed the Plaintiff's attacker(s) to loiter in the parking lot of Edgewood Terrace Apartments prior to the June 18, 2018 incident.

RESPECTFULLY SUBMITTED, this the 10th day of December, 2018.

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

BY:


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Run: 21-JUN-2018 15:50
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CITY OF JACKSON

Agency: 00

06/19/2013 thru 06/21/2018

Page: 1
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Search Criteria used:

Agency	Incident No/Sfx	Offense	Rpt Date	Location	Grid	Time
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00	002018085698 000	INFORMATION	06/06/2018	EDGEWOOD TERRACE DR	5772	15:30 * * *
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00	002018043684 000	HOUSE BURGLARY	03/24/2018	EDGEWOOD TERRACE DR	5772	15:52 * * *
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00	002018024380 000	ASSAULT-SIMPLE-FAMILY MEMBE	02/17/2018	EDGEWOOD TERRACE DR	5772	15:23 * * *
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00	002017182449 000	AUTO THEFT	11/09/2017	EDGEWOOD TERRACE DR	5772	07:54 * * *
00	002017182544 000	ASSAULT-SIMPLE-NONFAMILY	11/09/2017	EDGEWOOD TERRACE DR	5772	12:17 * * *
00	002017125299 000	INFORMATION	08/03/2017	EDGEWOOD TERRACE DR	5772	08:51 * * *
00	002017114425 000	ASSAULT-SIMPLE-NONFAMILY	07/16/2017	EDGEWOOD TERRACE DR	5772	02:23 * * *
00	002017114172 000	ASSAULT-SIMPLE-NONFAMILY	07/15/2017	EDGEWOOD TERRACE DR	5772	17:45 * * *
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00	002017024009 000	VANDALISM	02/12/2017	EDGEWOOD TERRACE DR	5772	16:00 * * *
00	002017012645 000	VANDALISM	01/22/2017	EDGEWOOD TERRACE DR	5772	14:15 * * *
00	002016224264 000	STOLEN LICENSE PLATES	12/30/2016	EDGEWOOD TERRACE DR	5772	09:36 * * *
00	002016223098 000	MISSING PERSON/RUNAWAY	12/28/2016	EDGEWOOD TERRACE DR	5772	07:35 * * *
00	002016223345 000	DISORDERLY CONDUCT	12/28/2016	EDGEWOOD TERRACE DR	5772	14:49 * * *
00	002016201151 000	AUTO THEFT	11/17/2016	EDGEWOOD TERRACE DR	5772	01:30 * * *
00	002016188330 000	AUTO BURGLARY	10/26/2016	EDGEWOOD TERRACE DR	5772	00:01 * * *
00	002016188300 000	AUTO THEFT	10/26/2016	EDGEWOOD TERRACE DR	5772	16:00 * * *
00	002016184063 000	FALSE PRETENSE-MISDEMEANOR	10/19/2016	EDGEWOOD TERRACE DR	5772	00:20 * * *
00	002016184030 000	FALSE PRETENSE-MISDEMEANOR	10/19/2016	EDGEWOOD TERRACE DR	5772	00:20 * * *
00	002016150829 000	VANDALISM	08/26/2016	EDGEWOOD TERRACE DR	5772	21:45 * * *
00	002016148524 000	EMBEZZLEMENT	08/23/2016	EDGEWOOD TERRACE DR	5772	09:49 * * *
00	002016136165 000	HOUSE BURGLARY	08/04/2016	EDGEWOOD TERRACE DR	5772	18:40 * * *
00	002016131712 000	AUTO BURGLARY	07/28/2016	EDGEWOOD TERRACE DR	5772	01:10 * * *
00	002016125751 000	STOLEN LICENSE PLATES	07/18/2016	EDGEWOOD TERRACE DR	5772	15:01 * * *
00	002016121801 000	HOUSE BURGLARY	07/12/2016	EDGEWOOD TERRACE DR	5772	15:10 * * *
00	002016117617 000	AUTO THEFT	07/06/2016	EDGEWOOD TERRACE DR	5772	03:00 * * *
00	002016102825 000	HOUSE BURGLARY	06/14/2016	EDGEWOOD TERRACE DR	5772	12:40 * * *
00	002016097513 000	AUTO BURGLARY	06/06/2016	EDGEWOOD TERRACE DR	5772	03:32 * * *
00	002016095864 000	AUTO BURGLARY	06/03/2016	EDGEWOOD TERRACE DR	5772	00:01 * * *
00	002016090119 000	AUTO BURGLARY	05/25/2016	EDGEWOOD TERRACE DR	5772	05:30 * * *
00	002016079357 000	OLD FINES	05/08/2016	EDGEWOOD TERRACE DR	5772	14:17 * * *
00	002016078266 000	ROBBERY-INDIVIDUAL	05/06/2016	EDGEWOOD TERRACE DR	5772	18:00 * * *
00	002016070934 000	AUTO BURGLARY	04/25/2016	EDGEWOOD TERRACE DR	5772	19:40 * * *
00	002016056734 000	OLD FINES	04/03/2016	EDGEWOOD TERRACE DR	5772	03:38 * * *
00	002016041246 000	ROBBERY-INDIVIDUAL	03/09/2016	EDGEWOOD TERRACE DR	5772	06:09 * * *
00	002016026770 000	INFORMATION	02/14/2016	EDGEWOOD TERRACE DR	5772	12:44 * * *
00	002016022565 000	AUTO THEFT	02/07/2016	EDGEWOOD TERRACE DR	5772	17:12 * * *
00	002016020829 000	ROBBERY-INDIVIDUAL	02/04/2016	EDGEWOOD TERRACE DR	5772	19:51 * * *
00	002016017917 000	AUTO BURGLARY	01/31/2016	EDGEWOOD TERRACE DR	5772	00:01 * * *
00	002016012819 000	ASSAULT-SIMPLE-NONFAMILY	01/22/2016	EDGEWOOD TERRACE DR	5772	19:50 * * *
00	002016010810 000	CHECK FORGERY	01/19/2016	EDGEWOOD TERRACE DR	5772	15:17 * * *
00	002015233025 000	LARCENY	12/23/2015	EDGEWOOD TER	5772	16:30 * * *
00	002015228751 000	ROBBERY-CARJACKING	12/16/2015	EDGEWOOD TERRACE DR	5772	07:15 * * *
00	002015223063 000	VANDALISM	12/07/2015	EDGEWOOD TERRACE DR	5772	17:17 * * *
00	002015217542 000	VANDALISM	11/28/2015	EDGEWOOD TERRACE DR	5772	22:30 * * *
00	002015203646 000	ASSAULT-SIMPLE-NONFAMILY	11/05/2015	EDGEWOOD TERRACE DR	5772	18:00 * * *
00	002015200303 000	ASSAULT-SIMPLE-FAMILY MEMBE	10/31/2015	EDGEWOOD TERRACE DR	5772	15:20 * * *
00	002015193453 000	HOUSE BURGLARY	10/21/2015	EDGEWOOD TERRACE DR	5772	07:40 * * *
00	002015184618 000	AUTO BURGLARY	10/08/2015	EDGEWOOD TERRACE DR	5772	01:00 * * *
00	002015182227 000	INFORMATION	10/04/2015	EDGEWOOD TERRACE DR	5772	00:01 * * *
00	002015180754 000	POSSESSION OF MARIJUANA	10/02/2015	EDGEWOOD TERRACE DR	5772	10:00 * * *
00	002015177641 000	VANDALISM	09/27/2015	EDGEWOOD TERRACE DR	5772	22:30 * * *
00	002015175134 000	AUTO BURGLARY	09/23/2015	EDGEWOOD TERRACE DR	5772	00:01 * * *
00	002015168885 000	LARCENY	09/13/2015	EDGEWOOD TERRACE DR	5772	00:01 * * *
00	002015167555 000	LARCENY	09/11/2015	EDGEWOOD TERRACE DR	5772	17:45 * * *
00	002015157771 000	AUTO BURGLARY	08/28/2015	EDGEWOOD TERRACE DR	5772	20:24 * * *
00	002015156986 000	AUTO THEFT	08/27/2015	EDGEWOOD TERRACE DR	5772	00:30 * * *
00	002015153165 000	VANDALISM	08/21/2015	EDGEWOOD TERRACE DR	5772	20:00 * * *
00	002015148725 000	VANDALISM	08/14/2015	EDGEWOOD TERRACE DR	5772	00:45 * * *
00	002015148719 000	AUTO BURGLARY	08/14/2015	EDGEWOOD TERRACE DR	5772	23:30 * * *
00	002015148707 000	AUTO BURGLARY	08/14/2015	EDGEWOOD TERRACE DR	5772	23:00 * * *
00	002015148697 000	AUTO BURGLARY	08/14/2015	EDGEWOOD TERRACE DR	5772	00:30 * * *
00	002015147392 000	AUTO BURGLARY	08/12/2015	EDGEWOOD TERRACE DR	5772	23:30 * * *
00	002015143317 000	HOUSE BURGLARY	08/06/2015	EDGEWOOD TERRACE DR	5772	10:00 * * *
00	002015114788 000	ASSAULT-SIMPLE-NONFAMILY	06/25/2015	EDGEWOOD TERRACE DR	5772	11:35 * * *
00	002015092491 000	HOUSE BURGLARY	05/23/2015	EDGEWOOD TERRACE DR	5772	14:30 * * *
00	002015091452 000	ROBBERY-INDIVIDUAL	05/22/2015	EDGEWOOD TERRACE DR	5772	12:20 * * *
00	002015090687 000	AUTO BURGLARY	05/21/2015	EDGEWOOD TERRACE DR	5772	20:30 * * *
00	002015077345 000	ROBBERY-INDIVIDUAL	05/01/2015	EDGEWOOD TERRACE DR	5772	12:20 * * *

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: _____

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

**PLAINTIFF'S FIRST SET OF DISCOVERY
TO DEFENDANT REBA ALFORD**

COMES NOW, Plaintiff, by and through her attorneys of record, and propounds her First Set of Interrogatories to Defendant Reba Alford to be answered separately, fully, under oath and in writing, within the requisite period of time pursuant to Mississippi Rules of Civil Procedure, propounding the same as follows:

INTERROGATORY NO. 1: Please describe any and all communications by you with any person(s) employed by Multifamily Management, Inc. or Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments regarding security, safety and trespassers at Edgewood Terrace Apartments.

INTERROGATORY NO. 2: Please describe any and all communications by you with tenants regarding security, safety and trespassers at Edgewood Terrace Apartments.

INTERROGATORY NO. 3: Please describe any and all communications that you had with tenants from January 1, 2010 through present regarding security, safety and trespassers at Edgewood Terrace Apartments.

INTERROGATORY NO. 4: Please describe any and all communications that you sent to Multifamily Management, Inc. or Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments

from January 1, 2010 through present regarding security, safety and trespassers at Edgewood Terrace Apartments.

INTERROGATORY NO. 5: Please describe any and all notices sent to tenants at Edgewood Terrace Apartments regarding crimes that occurred on the property from January 1, 2010 through present.

INTERROGATORY NO. 6: Please describe any and all notices sent to tenants at Edgewood Terrace Apartments regarding security on the property from January 1, 2010 through present.

INTERROGATORY NO. 7: Please describe any and all notices sent to tenants at Edgewood Terrace Apartments regarding trespassers on the property from January 1, 2010 through present.

INTERROGATORY NO. 8: Please describe any and all notices sent to tenants at Edgewood Terrace Apartments regarding the shooting that occurred on the property on June 18, 2018.

INTERROGATORY NO. 9: Please describe any and all communications by you with any person(s) employed by Multifamily Management, Inc. or Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments regarding the shooting that occurred on June 18, 2018.

INTERROGATORY NO. 9: Please describe any crimes against person(s) or property that you have been notified to have occurred at Edgewood Terrace Apartments from January 1, 2010 to present.

REQUEST FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT REBA ALFORD

COMES NOW, Plaintiff, by and through her attorneys of record, and request that the Defendant produce for inspection and copying pursuant to the Mississippi Rules of Civil Procedure at BROWN BASS & JETER, PLLC, 1755 LELIA DRIVE, SUITE 400, JACKSON, MISSISSIPPI 39216, the following documents:

REQUEST NO. 1: Please produce any and all documents you described in Interrogatory No.1 or relied on to respond to Interrogatory No. 1.

REQUEST NO. 2: Please produce any and all documents you described in Interrogatory No.2 or relied on to respond to Interrogatory No. 2.

REQUEST NO. 3: Please produce any and all documents you described in Interrogatory No.3 or relied on to respond to Interrogatory No. 3.

REQUEST NO. 4: Please produce any and all documents you described in Interrogatory No.4 or relied on to respond to Interrogatory No. 4.

REQUEST NO. 5: Please produce any and all documents you described in Interrogatory No.5 or relied on to respond to Interrogatory No. 5.

REQUEST NO. 6: Please produce any and all documents you described in Interrogatory No.6 or relied on to respond to Interrogatory No. 6.

REQUEST NO. 7: Please produce any and all documents you described in Interrogatory No.7 or relied on to respond to Interrogatory No. 7.

REQUEST NO. 8: Please produce any and all documents you described in Interrogatory No.8 or relied on to respond to Interrogatory No. 8.

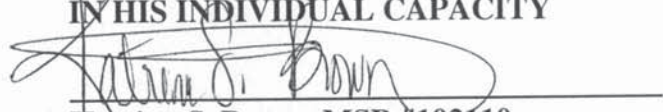
REQUEST NO. 9: Please produce any and all documents you described in Interrogatory

No.9 or relied on to respond to Interrogatory No. 9.

RESPECTFULLY SUBMITTED, this the 14th day of December, 2018.

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

BY:



Katrina S. Brown MSB #102110
Attorney for Plaintiff

OF COUNSEL:

Katrina S. Brown, MSB# 102110
BROWN BASS & JETER, PLLC
Post Office Box 22969
Jackson, Mississippi 39225
Telephone: (601) 487-8448
Facsimile: (601) 510-9934

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: _____

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

PLAINTIFF'S FIRST SET OF DISCOVERY TO DEFENDANT
MULTIFAMILY MANAGEMENT, INC.

COMES NOW, Plaintiff, by and through her attorneys of record, and propounds her First Set of Interrogatories to Defendant Multifamily Management, Inc. to be answered separately, fully, under oath and in writing, within the requisite period of time pursuant to Mississippi Rules of Civil Procedure, propounding the same as follows:

INTERROGATORY NO. 1: Please identify the person or persons responding to these interrogatories on behalf of Multifamily Management, Inc. and identify each person who has provided information in connection with these interrogatories.

INTERROGATORY NO. 2: Please identify any investigation conducted by you or anyone acting on your behalf in connection with the facts and circumstances alleged in the Complaint, including in your response:

- a. The name, address, and telephone number of each and every person conducting such investigation;
- b. The name, address, and telephone number of each and every person questioned and/or interviewed in connection with such investigation; and
- c. The name, address and telephone number of every person from whom any statement,

oral or written, was taken.

INTERROGATORY NO. 3: Please identify any of your employees or employees of Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments and Multifamily Management, Inc. who gave or made any statements to anyone after the incident in question, and state in detail the individual who gave or made such statements, the nature of such statements, the date such statements were given or made, and, the name, telephone number, and address of the person to whom they were made and/or who is in possession of any physical record of such statement.

INTERROGATORY NO. 4: Please identify any acts or omissions committed by Contarius Creamer that you believe may have contributed to this incident or Mr. Creamer's injuries, including therein:

- a. The factual basis for said allegation;
- b. All evidence, physical or otherwise, which supports or tends to support said allegation; and
- c. The name and telephone number of persons having knowledge of the facts underlying said allegation.

INTERROGATORY NO. 5: If any person or company carrying on an insurance business may be liable to satisfy part or all of a judgement which may be entered in this action or to indemnify or reimburse for payments made to satisfy a judgement in this action, please identify such person or company; the type of such coverage, indemnity or reimbursement; the policy number of any such policies; and if the matter is being defended under a reservation of rights.

INTERROGATORY NO. 6: Please state the names, addresses, and dates of ownership of all owners of the Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments from 2010 to present.

INTERROGATORY NO. 7: Please list any claims or demands made or civil suits filed

against you or Edgewood Terrace, LLC d/b/a Edgewood Terrace Apartments which included allegations of failure to warn of dangers at Edgewood Terrace Apartments or failure to provide adequate security at Edgewood Terrace Apartments, and for each claim or suit, please state the following: the identity of the plaintiff or claimant; the court or forum where filed; the docket or civil action number of the case; the final disposition or resolution of the claim or suit; and the date the claim was made or suit filed and the date of any resolution thereof.

INTERROGATORY NO. 8: Please describe the familial, business, and/or any other relationships between any Defendants named in the Complaint.

INTERROGATORY NO. 9: Please state the names, addresses and telephone numbers of all persons you may call as witnesses during the trial of this matter and give a brief summary of the subject matter to which each will testify.

INTERROGATORY NO. 10: Please identify any photographs, film or videos which have been taken of the incident involving Contarius Creamer by stating the date taken; the individual who took the photographs, film or videos; and, the individual who has possession of the photographs, film or videos or any duplicates of the photographs, film or video.

INTERROGATORY NO. 11: Explain in detail what security, if any, you had in place at the time of the incident involving Contarius Creamer's attack and shooting.

INTERROGATORY NO. 12: What security measures were taken after June 18, 2018, to reduce the likelihood of other invitees being attacked, shot at Edgewood Terrace Apartments?

INTERROGATORY NO. 13: Prior to June 18, 2018, please identify any and all security studies, reports or investigations initiated or conducted by you or at your request or of which you are otherwise aware at Edgewood Terrace Apartments, 220 Edgewood Terrace Drive, Jackson, MS.

INTERROGATORY NO. 14: Please state in complete and accurate detail your full account

of how the incident in question occurred from just prior to its occurrence and thereafter until Contarius Creamer left the scene of the incident, including in your response the date or approximate date that you became aware of the subject incident and the identity of the source of such information.

INTERROGATORY NO. 15: Please identify by names, location and description any other apartments or business entities operated or managed by you in the State of Mississippi.

INTERROGATORY NO. 16: For the five (5) year period preceding June 18, 2018, please provide the following for each entity identified in response to Interrogatory No. 15.

- a. Any previously reported or known crimes occurring on the premises;
- b. The nature of the crime reported;
- c. The date said crime was reported; and
- d. What steps or measures were taken by you following and in response to said report?

INTERROGATORY NO. 17: Please list the name, address, and telephone number of each person, corporation and/or other entity which held any type equitable, legal, management or lease interest in the property located at 220 Edgewood Terrace, Drive Jackson, MS on June 18, 2018 and the preceding five (5) year period from June 18, 2018.

INTERROGATORY NO. 18: Identify any written agreements or contracts between any parties regarding security and/or operation of Edgewood Terrace Apartments located at 220 Edgewood Terrace, Drive Jackson, MS, MS from January 1, 2010 to December 1, 2018, and the location of said written agreements or contracts.

INTERROGATORY NO. 19: Please state whether you have ever received notice from anyone about a crime problem, including but not limited to drug usage or sale, alcohol consumption on the premises, loitering, assaults, and other violent crimes of any nature on the subject premises or surrounding area, and if so, please state the names, addresses and telephone numbers of

the persons who brought the information to your attention.

INTERROGATORY NO. 20: Please state whether you or Edgewood Terrace, LLC have ever been advised to maintain a credible security presence at the subject premises. If so, please state the specific circumstances under which you were advised to maintain the security presence.

INTERROGATORY NO. 21: State the name, address, telephone number and titles of all persons directly responsible for management and supervision of the common areas of Edgewood Terrace Apartments located at 220 Edgewood Terrace, Drive Jackson, MS and the three (3) year period preceding June 18, 2018.

INTERROGATORY NO. 22: Please state the names, addresses and dates of management of all general managers, property managers and owners, whether as an individual or entity, of Edgewood Terrace Apartments located at 220 Edgewood Terrace, Drive Jackson, MS, from 2010 to present.

INTERROGATORY NO. 23: Please state the names, addresses and dates of responsibility of all individuals and entities who had any obligation to provide any type of security at Edgewood Terrace Apartments located at 220 Edgewood Terrace, Drive Jackson, MS from 2010 to present.

INTERROGATORY NO. 24: Please describe in detail the procedure and method for maintaining and inspecting Edgewood Terrace Apartments located at 220 Edgewood Terrace, Drive Jackson, MS and identify the dates of the most recent inspections of complex. This request includes but is not limited to lighting, light fixtures, and light standards in the parking lot and common areas of Edgewood Terrace Apartments and inspections made relating to the change of ownership of Edgewood Terrace Apartments or renovation of Edgewood Terrace Apartments.

INTERROGATORY NO. 25: Please set forth specifically and in detail, all crimes and/or reported criminal incidents committed on the premises of the apartment complex named in the

complaint for five years prior to the subject incident, including for each crime and/or reported criminal incident the type of crime and/or reported criminal incident; the date of the crime and/or reported criminal incident, and name and address of the victim of the crime and/or reported criminal incident.

INTERROGATORY NO. 26: Please state the names, address and phone number of all of the courtesy officers at Edgewood Terrace Apartments located at 220 Edgewood Terrace, Drive Jackson, MS, for the last five years prior to the subject incident.

INTERROGATORY NO. 27: Please state in detail the date and substance of any and all notices, incidents or reports of felonies, misdemeanors, violence, or harassment, communicated to you or your agents/representative, whether communicated orally or in writing, which were reported to have occurred at Edgewood Terrace Apartments during the period January 1, 2010, to present, and identify all persons with knowledge of such notices, incidents, or reports.

**REQUEST FOR PRODUCTION OF DOCUMENTS
TO INTERSTATE REALTY MANAGEMENT COMPANY**

COMES NOW, Plaintiff, by and through her attorneys of record, and request that the Defendant produce for inspection and copying pursuant to the Mississippi Rules of Civil Procedure at BROWN BASS & JETER, PLLC, 1755 LELIA DRIVE, SUITE 400, JACKSON, MISSISSIPPI 39216, the following documents:

REQUEST NO. 1: All letters, civil complaints, or any other documents relating to the failure to provide or maintain reasonable security at the Edgewood Terrace Apartments.

REQUEST NO. 2: Financial statements, balance sheets, and audited reports which reflect your net worth for the fiscal years ended 2015, 2016 and 2017 and your most recent financial statement. This document request is continuing and includes the most current income statements available as of the date of the trial of this cause.

REQUEST NO. 3: A copy of each insurance agreement under which any person carrying on an insurance business may be liable for part or all of a judgment which may be entered against you in this action, including those agreements under which you may be indemnified or reimbursed for payments made to satisfy the judgment.

REQUEST NO. 4: All documentation relating to your relationship with any other named Defendant in this matter.

REQUEST NO. 5: Any agreements or contracts entered into between you and any other Defendant which were in effect during the calendar year 2018.

REQUEST NO. 6: Any agreements or contracts entered into between you and any other individual or entity which were in effect at any time during the calendar year 2018, and which relate to the indemnification for claims or judgments for negligence involving the located 220 Edgewood Terrace, Drive Jackson, MS.

REQUEST NO. 7: All documents which relate to the duties and responsibilities for maintaining, policing, patrolling, securing, or otherwise managing and maintaining the premises and common areas at Edgewood Terrace Apartments, for the time period January 1, 2010 to present.

REQUEST NO. 8: All documents relating to any safety measures or precautions which were considered, planned, taken, in existence, or implemented by you or any other entity or individual regarding the premises and common areas at Edgewood Terrace Apartments January 1, 2010 to present.

REQUEST NO. 9: All correspondence and documents relating to the assault, and shooting sent to, received from, or exchanged with your insurer or its representatives.

REQUEST NO. 10: All correspondence or other documentation transmitted to or received from any private security service or company relating to Edgewood Terrace Apartments during the

time period January 1, 2010 to present.

REQUEST NO. 11: Any and all documents, manuals, books, videotapes or audio tapes, etc., given to employees regarding security, crime, criminal activity, or common area maintenance at Edgewood Terrace Apartments.

REQUEST NO. 12: Any and all documents, notices, manuals, videotapes, audiotapes, etc., given to the tenants or guests of tenants regarding the security, crime, criminal activity, or common area maintenance at Edgewood Terrace Apartments.

REQUEST NO. 13: Please produce a map and/or areal layout of the Edgewood Terrace Apartments.

REQUEST NO. 14: Any depositions of you or any other Defendant which were given or taken in premises liability lawsuits regarding the safety of the premises in the five years prior to the subject incident.

REQUEST NO. 15: Produce copies of the "legal pleadings", as defined below, if any, regarding any claims made against you in premises liability lawsuits regarding the safety of Edgewood Terrace Apartments premises from January 1, 2010 - present. For purposes of this Request, the term "legal pleadings" shall include the Complaint, Answer, and Judgment.

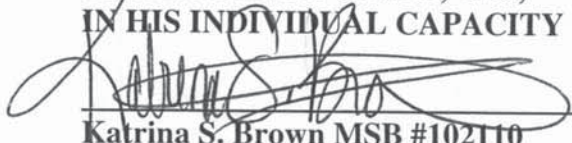
REQUEST NO. 16: For each case identified in response to the preceding Request for Production, produce a copy of each Settlement Agreement and/or Release executed in relation to each case.

REQUEST NO. 17: All contracts, agreements, and/or documents relating to any agreements Edgewood Terrace Apartments had with other entities to provide security at the subject property at the time of the incident alleged in the complaint.

RESPECTFULLY SUBMITTED, this the 10th day of December, 2018.

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

BY:



Katrina S. Brown MSB #102110
Attorney for Plaintiff

OF COUNSEL:

Katrina S. Brown, MSB# 102110
BROWN BASS & JETER, PLLC
Post Office Box 22969
Jackson, Mississippi 39225
Telephone: (601) 487-8448
Fascimile: (601) 510-9934

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: 18-697

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

NOTICE OF SERVICE OF DISCOVERY

Notice is hereby given that Plaintiff, by and through her attorney, has this day served
Plaintiffs Request for Admissions to Defendants Reba Alford and Multifamily Management,
Inc., pursuant to the Mississippi Rules of Civil Procedure.

The undersigned counsel retains the original of the above document as custodian thereof.

Respectfully submitted on this, the 6th day of December, 2018.

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

BY: 

Katrina S. Brown MSB #102110
Attorney for Plaintiff

OF COUNSEL:

Katrina S. Brown, MSB# 102110
BROWN BASS & JETER, PLLC
Post Office Box 22969
Jackson, Mississippi 39225
Telephone: (601) 487-8448
Fascimile: (601) 510-9934
bass@bbjlawyers.com

CERTIFICATE OF SERVICE

I, Katrina S. Brown, one of the attorneys for Plaintiff, do hereby certify that I have this day served with the Complaint the *Plaintiff's Request for Admissions to Defendant's Reba Alford and Multifamily Management, Inc.* and the *Notice of Service* to the following:

Reba Alford
330 Four Seasons Drive, Apt. C-13, 220
Jackson, Mississippi 39206

Multifamily Management, Inc.
759 Vieux Marche Mall
Biloxi, Mississippi 39530

So certified on this, the 6th day of December, 2018.

BY:


Katrina S. Brown

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: 18-697

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

NOTICE OF SERVICE OF DISCOVERY

Notice is hereby given that Plaintiff, by and through her attorney, has this day served *Plaintiffs First Set of Interrogatories and Request for Production of Documents to Defendants Reba Alford and Multifamily Management, Inc.*, pursuant to the Mississippi Rules of Civil Procedure.

The undersigned counsel retains the original of the above document as custodian thereof.

Respectfully submitted on this, the 6th day of December, 2018.

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

BY: 

Katrina S. Brown MSB #102110
Attorney for Plaintiff

OF COUNSEL:

Katrina S. Brown, MSB# 102110
BROWN BASS & JETER, PLLC
Post Office Box 22969
Jackson, Mississippi 39225
Telephone: (601) 487-8448
Facsimile: (601) 510-9934
bass@bbjlawyers.com

CERTIFICATE OF SERVICE

I, Katrina S. Brown, one of the attorneys for Plaintiff, do hereby certify that I have this day served with the Complaint the *Plaintiffs First Set of Interrogatories and Request for Production of Documents to Defendants Reba Alford and Multifamily Management, Inc.* and the *Notice of Service* to the following:

Reba Alford
330 Four Seasons Drive, Apt. C-13, 220
Jackson, Mississippi 39206

Multifamily Management, Inc.
759 Vieux Marche Mall
Biloxi, Mississippi 39530

So certified on this, the 6th day of December, 2018.

BY:



Katrina S. Brown

Case 25-CV-18

Document #: 2-1

Filed: 12/10/2018

Page 1 of 2

COVER SHEET Civil Case Filing Form (To be completed by Attorney/Party Prior to Filing of Pleading)		Case # <u>25</u> <u>1</u> <u>01</u> County # Judicial District Court ID District (CH, CI, CO) <u>1</u> <u>2</u> <u>1</u> <u>0</u> <u>1</u> <u>8</u> Month Date Year This area to be completed by clerk	Case Year <u>20</u> <u>18</u> Docket Number <u>6</u> <u>9</u> <u>7</u> Local Docket ID
Mississippi Supreme Court Administrative Office of Courts		Form AOC/01 (Rev 2009)	
In the <u>CIRCUIT</u> Court of <u>HINDS</u> County — <u>FIRST</u> Judicial District		Case Number if filed prior to 1/1/94	
Origin of Suit (Place an "X" in one box only) <input checked="" type="checkbox"/> Initial Filing <input type="checkbox"/> Reinstated <input type="checkbox"/> Foreign Judgment Enrolled <input type="checkbox"/> Transfer from Other court <input type="checkbox"/> Other <input type="checkbox"/> Remanded <input type="checkbox"/> Reopened <input type="checkbox"/> Joining Suit/Action <input type="checkbox"/> Appeal			
Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form Individual <u>Creamer</u> <u>Angela</u> Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____			
Business Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____			
Address of Plaintiff <u>211 Forbes Cove. Bvram. Mississippi 39272</u>			
Attorney (Name & Address) <u>Katrina Brown. P.O. Box 22969. Jackson. MS 39225</u> MS Bar No. <u>102110</u> Check (x) if Individual Filing Initial Pleading is NOT an attorney Signature of Individual Filing: <u>[Signature]</u>			
Defendant - Name of Defendant - Enter Additional Defendants on Separate Form Individual _____ Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____ Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____			
Business <u>Edgewood Terrace LLC d/b/a Edgewood Terrace Apartments</u> Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____			
Attorney (Name & Address) - If Known _____ MS Bar No. _____			
Damages Sought: Compensatory \$ _____ Punitive \$ _____ Check (x) if child support is contemplated as an issue in this suit.* *If checked, please submit completed Child Support Information Sheet with this Cover Sheet			
Nature of Suit (Place an "X" in one box only)			
Domestic Relations <input type="checkbox"/> Child Custody/Visitation <input type="checkbox"/> Child Support <input type="checkbox"/> Contempt <input type="checkbox"/> Divorce: Fault <input type="checkbox"/> Divorce: Irreconcilable Diff. <input type="checkbox"/> Domestic Abuse <input type="checkbox"/> Emancipation <input type="checkbox"/> Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Property Division <input type="checkbox"/> Separate Maintenance <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA) <input type="checkbox"/> Other _____ Appeals <input type="checkbox"/> Administrative Agency <input type="checkbox"/> County Court <input type="checkbox"/> Hardship Petition (Driver License) <input type="checkbox"/> Justice Court <input type="checkbox"/> MS Dept Employment Security <input type="checkbox"/> Worker's Compensation <input type="checkbox"/> Other _____	Business/Commercial <input type="checkbox"/> Accounting (Business) <input type="checkbox"/> Business Dissolution <input type="checkbox"/> Debt Collection <input type="checkbox"/> Employment <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Replevin <input type="checkbox"/> Other _____ Probate <input type="checkbox"/> Accounting (Probate) <input type="checkbox"/> Birth Certificate Correction <input type="checkbox"/> Commitment <input type="checkbox"/> Conservatorship <input type="checkbox"/> Guardianship <input type="checkbox"/> Heirship <input type="checkbox"/> Intestate Estate <input type="checkbox"/> Minor's Settlement <input type="checkbox"/> Muniment of Title <input type="checkbox"/> Name Change <input type="checkbox"/> Testate Estate <input type="checkbox"/> Will Contest <input type="checkbox"/> Other _____	Children/Minors - Non-Domestic <input type="checkbox"/> Adoption - Contested <input type="checkbox"/> Adoption - Uncontested <input type="checkbox"/> Consent to Abortion Minor <input type="checkbox"/> Removal of Minority <input type="checkbox"/> Other _____ Civil Rights <input type="checkbox"/> Elections <input type="checkbox"/> Expungement <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Post Conviction Relief/Prisoner <input type="checkbox"/> Other _____ Contract <input type="checkbox"/> Breach of Contract <input type="checkbox"/> Installment Contract <input type="checkbox"/> Insurance <input type="checkbox"/> Specific Performance <input type="checkbox"/> Other _____ Statutes/Rules <input type="checkbox"/> Bond Validation <input type="checkbox"/> Civil Forfeiture <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction or Restraining Order <input type="checkbox"/> Other _____	Real Property <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Ejectment <input type="checkbox"/> Eminent Domain <input type="checkbox"/> Eviction <input type="checkbox"/> Judicial Foreclosure <input type="checkbox"/> Lien Assertion <input type="checkbox"/> Partition <input type="checkbox"/> Tax Sale: Confirm/Cancel <input type="checkbox"/> Title Boundary or Easement <input type="checkbox"/> Other _____ Torts <input type="checkbox"/> Bad Faith <input type="checkbox"/> Fraud <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malpractice - Legal <input type="checkbox"/> Malpractice - Medical <input type="checkbox"/> Mass Tort <input checked="" type="checkbox"/> Negligence - General <input type="checkbox"/> Negligence - Motor Vehicle <input type="checkbox"/> Product Liability <input type="checkbox"/> Subrogation <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Other _____

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI

FIRST JUDICIAL DISTRICT, CITY OF _____

Docket No. 18 - 697 Docket No. If Filed
 File Yr Chronological No. Clerk's Local ID Prior to 1/1/94 _____

PLAINTIFFS IN REFERENCED CAUSE - Page 1 of _____ Plaintiffs Pages
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEET

Plaintiff #2:

Individual: _____ (_____) _____
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business Multifamily Management, Inc.

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Plaintiff #3:

Individual: Alford Reba _____
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

Plaintiff #4:

Individual: _____ (_____) _____
 Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

____ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of _____

____ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:
 D/B/A _____

Business _____

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

____ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:
 D/B/A _____

ATTORNEY FOR THIS PLAINTIFF: _____ Bar # or Name: _____ Pro Hac Vice (✓) _____ Not an Attorney(✓) _____

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: 18-697

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: EDGEWOOD TERRACE, LLC
d/b/a EDGEWOOD TERRACE APARTMENTS
Registered Agent, Nancy Joseph
220 Edgewood Terrace Drive, Suite F-11
Jackson, Mississippi 39236

NOTICE TO DEFENDANT

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Katrina S. Brown, Esq., Brown Bass & Jeter, PLLC, attorneys for Plaintiffs, Angela Creamer, as Next Friend and Natural Mother of her Minor Child C.C. in his Individual Capacity, whose post office address is Post Office Box 22969, Jackson, Mississippi 39225, and whose street address is 1755 Lelia Drive, Suite 400, Jackson, Mississippi 39216. Your response must be mailed or delivered within thirty (30) days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

ISSUED UNDER MY HAND AND SEAL OF SAID COURT this 10th day of December, 2018.

ZACK WALLACE,
HINDS COUNTY CIRCUIT CLERK



BY: [Signature], D. C.

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

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CAUSE NO.: 18-697

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: REBA ALFORD
330 Four Seasons Drive, Apt. C-13, 220
Jackson, Mississippi 39206

NOTICE TO DEFENDANT

THE COMPLAINT WITH DISCOVERY ATTACHED WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

You are required to mail or hand-deliver a copy of a written response to the Complaint to Katrina S. Brown, Esq., Brown Bass & Jeter, PLLC, attorneys for Plaintiffs, Angela Creamer, as Next Friend and Natural Mother of her Minor Child C.C. in his Individual Capacity, whose post office address is Post Office Box 22969, Jackson, Mississippi 39225, and whose street address is 1755 Lelia Drive, Suite 400, Jackson, Mississippi 39216. Your response must be mailed or delivered within forty-five (45) days from the date of delivery of this Summons and Complaint or a judgment by default will be entered against you for the money or things demanded in the Complaint.

You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

ISSUED UNDER MY HAND AND SEAL OF SAID COURT this 10th day of December, 2018.

ZACK WALLACE,
HINDS COUNTY CIRCUIT CLERK

BY: [Signature], D. C.



IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: 18-697

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
and JOHN DOES 1-9

DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: MULTIFAMILY MANAGEMENT, INC.
Registered Agent, Tere Richardson Steel
759 Vieux Marche Mall
Biloxi, Mississippi 39530

NOTICE TO DEFENDANT

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IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS.

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ISSUED UNDER MY HAND AND SEAL OF SAID COURT this 10th day of December, 2018.

ZACK WALLACE,
HINDS COUNTY CIRCUIT CLERK

BY: [Signature], D. C.



IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

ANGELA CREAMER, AS NEXT
FRIEND AND NATURAL MOTHER
OF HER MINOR CHILD, C.C.,
IN HIS INDIVIDUAL CAPACITY

PLAINTIFF

v.

CAUSE NO.: 18-697

EDGEWOOD TERRACE, LLC d/b/a EDGEWOOD TERRACE
APARTMENTS; MULTIFAMILY MANAGEMENT, INC.;
REBA ALFORD, INDIVIDUALLY;
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DEFENDANTS

SUMMONS

THE STATE OF MISSISSIPPI

TO: MULTIFAMILY MANAGEMENT, INC.
Registered Agent, Tere Richardson Steel
759 Vieux Marche Mall
Biloxi, Mississippi 39530

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You must also file the original of your response with the Clerk of this Court within a reasonable time afterward.

ISSUED UNDER MY HAND AND SEAL OF SAID COURT this 10th day of December, 2018.

ZACK WALLACE,
HINDS COUNTY CIRCUIT CLERK

BY: [Signature], D. C.



RETURN OF SERVICE

I, Lakecia Williams, do hereby certify that I have this day personally served a true copy of the Civil Summons and Complaint by personally serving a copy of the same to MULTIFAMILY MANAGEMENT, INC. via Its Registered Agent Tere Richardson Steel located at 460 Briarwood Drive, Suite 415, Jackson, MS 39211.

THIS, the 2nd day of January, 2019.

Lakecia Williams
PROCESS SERVER

NOTARY ACKNOWLEDGMENT

STATE OF MISSISSIPPI:

COUNTY OF Hinds:

PERSONALLY appeared before me the undersigned authority in and for the jurisdiction aforesaid, the within named Lakecia Williams individually, and who being by me duly sworn, stated under oath that the matters and things set forth in the above and foregoing instrument are true and correct as therein stated.

SWORN AND SUBSCRIBED before me on this, the 2nd day of January, 2019.

Karen LaRene Goldman
NOTARY PUBLIC

My Commission Expires:

